

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
DIVISION OF SHREVEPORT**

**TOLA MAE JAMES, JOHNETTA, § CIVIL ACTION NO. 5:21-cv-02407
COLEMAN, AND ANGELA JACKSON,
INDIVIDUALLY AND ON BEHALF OF
THE ESTATE OF REV. JOHN HENRY
JAMES**

**V. § CHIEF JUDGE S. MAURICE HICKS,
JR.**

**PMG OPCO-WASHINGTON, LLC
D/B/A BOOKER T. WASHINGTON § MAGISTRATE JUDGE MARK L.
SKILLED NURSING & HORNSBY
REHABILITATION AND KOURTNEY
BROWNLEE**

RESPONSE TO REMOVAL ORDER

Defendants PMG OPCO-Washington, LLC d/b/a Booker T. Washington Skilled Nursing & Rehabilitation (“BTW”) and Kourtney Brownlee, files this response to the Court’s Removal Order (Doc 4) as follows:

(1)(a) List of all attorneys involved in the case and the parties they represent:

Plaintiffs	Tola Mae James, Johnetta James, and Angela Jackson, Individually and on behalf of the Estate of Rev. John Henry James	Ronald J. Miciotto (LA Bar No. 07540) 628 Stoner Ave. Shreveport, LA 71101 rjmatty681@gmail.com Email Robert L. Salim (LA Bar No. 11663) 1901 Texas St. Natchitoches, LA 71457 robertsalim@cp-tel.net Email
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Robert E. Piper, Jr. (LA Bar No. 10522)
1515 Poydras St., Ste. 1040
New Orleans, LA 70112
504-371-5550 Telephone
504-525-6272 Facsimile

Defendants	PMG OPCO- Washington d/b/a Booker T. Washington Skilled Nursing & Rehabilitation and Kourtney Brownlee	Ronald E. Raney (LA Bar No. 8570) Penny N. Nowell (LA Bar No. 22505) Lunn Irion Law Firm P.O. Box 1534 Shreveport, LA 71165-1534 rer@lunnirion.com Email pnn@lunnirion.com Email
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- (1)(b) An electronic image of all records and proceedings, occurring in the State Court prior to removal, arranged by order of filing date was filed on August 9, 2021.

See Exhibit to Notice of Removal (Doc. 1-2), previously filed by BTW and Kourtney Brownlee in this proceeding and containing copies of all records and documents filed in the state court proceeding prior to removal.

- (1)(c) A list of documents included in the State Court record, arranged by order of filing date:

Petition for Damages filed on or about May 21, 2021;
Summons Issued to BTW on or about July 2, 2021;
Summons Issued to Kourtney Brownlee on or about July 2, 2021;
Return of Service to BTW filed on or about July 14, 2021;
Return of Service to Kourtney Brownlee filed on or about July 14, 2021;

- (1)(d) Certificate by Counsel that the above constitutes the entire State Court record.

Undersigned counsel hereby certifies that the documents listed above and filed on August 9, 2021 (Doc 1) constitute the entire State Court record in this matter.

- (2) If motions or exceptions were pending in State Court at the time of removal, such motions or exceptions must be refiled in proper form and in accordance with LR 7. Counsel may adopt by reference a brief or memorandum previously filed in State Court. Failure to refile these motions or exceptions will constitute their abandonment as if they were never filed.

No motions or exceptions were pending in State Court at the time of removal.

- (3) If funds are being held by State Court for benefit of litigants, counsel for the removing defendant, is directed to make arrangements to have such funds paid into the registry of this Court. Please note that this only applies to what is commonly known as “registry funds.” Funds on deposit with the State Court to cover accrued costs should not be transferred to Federal Court.

No funds were held by the State Court for benefits of the litigants in this matter at the time of removal.

- (4) Undersigned counsel has been admitted to practice in this court.

This 9th day of September, 2021.

Respectfully submitted,

LUNN IRION LAW FIRM, LLC

BY: /s/ Ronald E. Raney
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Penny N. Nowell, Bar Roll #22505
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**ATTORNEYS FOR PMG OPCO-WASHINGTON,
LLC D/B/A BOOKER T. WASHINGTON SKILLED
NURSING & REHABILITATION CENTER, AND
KOURTNEY BROWNLEE**

CERTIFICATE OF SERVICE

I certify that on September 9, 2021, a copy of the foregoing was filed with the Clerk of Court by using the CM/ECF system which will send notice of electronic filing to all counsel of record.

/s/ Ronald E. Raney